

01:17:25 1 with these features?

01:17:25 2 A. We looked at Thefacebook, yes.

01:17:28 3 Q. And you extracted course information from
01:17:32 4 ConnectU -- I mean, from Thefacebook?

01:17:34 5 MR. HORNICK: Object to the form of
01:17:35 6 the question and assumes facts not in
01:17:36 7 evidence.

01:17:36 8 A. Yeah, when collecting course information
01:17:40 9 there's basically two -- you know, it's
01:17:43 10 public course information that's posted by a
01:17:45 11 registrar from the school, and you can
01:17:47 12 either go to the registrar or you can go,
01:17:49 13 you know -- and Thefacebook had the courses.
01:17:51 14 So, yes, we did look at the courses which,
01:17:55 15 again, is public proprietary information,
01:17:59 16 and we collected that, yes.

01:18:01 17 Q. How did you collect it?

01:18:02 18 A. We just would like look at the file in a
01:18:07 19 text editor and just take the course file.

01:18:10 20 Q. Did you ever extract e-mails from
01:18:12 21 Thefacebook?

01:18:13 22 A. We -- yes, we have extracted e-mails from
01:18:17 23 Thefacebook.

01:18:18 24 Q. Isn't it true that you've extracted 2.9 to 3
01:18:21 25 million e-mails from Thefacebook because of

01:18:24 1

a security hole you found?

01:18:25 2

MR. HORNICK: Objection. It's a

01:18:27 3

misleading question, but you can answer it

01:18:29 4

if you can.

01:18:30 5

A. We have extracted e-mails basically just,

01:18:38 6

you know, following -- an e-mail has a -- at

01:18:45 7

that point they had a URL, and you could

01:18:46 8

follow that URL and it's completely

01:18:49 9

authorized -- it's not unauthorized access,

01:18:52 10

and you can follow that URL to find an

01:18:55 11

e-mail address, yes, you could. And we did.

01:18:57 12

Q. So did you find a way to extract those

01:19:01 13

e-mails without logging onto Thefacebook?

01:19:06 14

MR. HORNICK: Objection. I think

01:19:07 15

this is outside the scope. It's not

01:19:09 16

30(b)(6) testimony.

01:19:12 17

A. See, again, I don't remember -- I'm not a

01:19:15 18

programmer, but it's my understanding that

01:19:19 19

with unauthorized -- excuse me, with

01:19:21 20

authorized -- without using unauthorized

01:19:24 21

access those e-mails were accessible.

01:19:25 22

Q. And ConnectU took them?

01:19:28 23

MR. HORNICK: Object to the form of

01:19:29 24

the question.

01:19:29 25

A. What do you mean by take?

01:19:31 1 Q. Extracted the information?

01:19:32 2 A. ConnectU followed an open URL, "open" being

01:19:36 3 that it was accessible with not having to

01:19:41 4 use unauthorized access, it was accessible,

01:19:44 5 out in the open, and ConnectU followed those

01:19:46 6 URLs and was able to collect e-mail

01:19:50 7 addresses.

01:19:50 8 Q. And who did that?

01:19:51 9 A. Winston Williams.

01:19:52 10 Q. Winston Williams did that? And when did he

01:19:55 11 do that?

01:19:56 12 A. I believe he did it in the spring of this

01:19:58 13 year.

01:19:58 14 Q. Were those e-mails ever used by ConnectU?

01:20:01 15 A. I think we used some of them with the Social

01:20:06 16 Butterfly software.

01:20:06 17 Q. And how were they used?

01:20:07 18 A. If a friend used Social Butterfly and wanted

01:20:11 19 to invite their friends, then they could do

01:20:14 20 that with Social Butterfly. And they --

01:20:16 21 Q. So when you -- once you had those e-mails,

01:20:20 22 did you -- well, what did you do with them?

01:20:22 23 A. We just held them in a holding bin, and if a

01:20:29 24 user said, I would like to invite my friend,

01:20:31 25 well, we would just invite their friends.